

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA, :
:
- against - : Case No. 19 Cr. 366 (LGS)
:
STEPHEN M. CALK, :
:
Defendant. :
:
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PLEASE TAKE NOTICE that upon the Declaration of Paul H. Schoeman, Esq., dated May 19, 2021, the accompanying Memorandum of Law, and all prior papers and proceedings in this action, the defendant Stephen M. Calk, by his undersigned attorneys, will move this Court before the Honorable Lorna G. Schofield, United States District Judge, at the United States Courthouse for the Southern District of New York, at a date and time to be determined by the Court, for an order precluding the government from calling Randall Rigby as a trial witness, or otherwise using at trial any evidence obtained, directly or indirectly, from the grand jury subpoena served on Rigby.

Defendant respectfully requests oral argument in connection with this motion.

Dated: New York, New York
May 19, 2021

Respectfully submitted,

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